



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Delivered via email to Brian Ablett
RETURN RECEIPT REQUESTED
In Reply Refer to:
ExxonMobil Refinery, Torrance, CA

Brian Ablett, Refinery Manager
ExxonMobil Torrance Refinery
3700 West 190th Street
Torrance, CA 90509-2929

RE: Request for Information
ExxonMobil Torrance Refinery

Dear Mr. Ablett:

The United States Environmental Protection Agency ("EPA") Region IX is conducting an investigation of the ExxonMobil Torrance Refinery (the "Facility"), located at 3700 West 190th Street, Torrance, CA 90509-2929, which is owned and operated by ExxonMobil Corporation (the "Company"), to evaluate the Company's compliance at the Facility with Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9603; Sections 302 through 312 of the Emergency Planning and Community Right-to-Know Act ("EPCRA"), 42 U.S.C. §§ 11002 – 11022; and Section 112(r) of the Clean Air Act ("CAA"), 42 U.S.C. § 7412(r).

The enclosed request for information ("Information Request") is authorized pursuant to:

- CERCLA, as amended, 42 U.S.C. § 9601 et seq.
- EPCRA, 42 U.S.C. § 11001 et seq.
- CAA, as amended, 42 U.S.C. § 7401 et seq.

Please provide copies of the requested documents to EPA no later than 25 days from the date of receipt of this letter. Electronic copies are preferable. EPA believes that much of the requested

information is, or should be, readily available at the Facility. The Company's response should be directed to:

Mr. Jeremy Deyoe (SFD-9-3)
EPCRA/RMP Compliance Officer
U.S. EPA Region IX
75 Hawthorne St.
San Francisco, CA 94105

Please note that the Company's compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5), or Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3). These statutory provisions authorize EPA to seek penalties up to \$37,500 for each day of noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have questions about the legal aspects of this Information Request, please contact Mr. Andrew Helmlinger, U.S. EPA Assistant Regional Counsel, at (415) 972-3904 or Helmlinger.Andrew@epa.gov. The Region IX technical contact for this Information Request is Jeremy Deyoe, EPCRA/RMP Compliance Officer. Mr. Deyoe can be reached at (415) 972-3081 or Deyoe.Jeremy@epa.gov. We thank you in advance for your cooperation.

Sincerely,



Enrique Manzanilla, Director
Superfund Division

Enclosures

Information Request (Instructions, Definitions, Questions)

cc: J. Deyoe, U.S. EPA Region IX
A. Helmlinger, U.S. EPA Region IX
M. Nazemi, South Coast AQMD
L. Thomas, Cal OSHA
M. Serna, Torrance Fire Department

ENCLOSURE

INSTRUCTIONS

1. Please provide a separate response to each request, and identify each response by the number of the request to which it corresponds. For each document produced, identify the request to which it is responsive.
2. Knowledge or information that has not been memorialized in any document, but is nonetheless responsive to a request, must be provided in a narrative form.
3. The scope of this Information Request includes all information and documents obtained or independently developed by the Company, its attorneys, consultants or any of their agents, consultants, or employees.
4. The Company may not withhold any information from EPA on the grounds that it is confidential business information. EPA has promulgated regulations, under 40 C.F.R. § 2, Subpart B, to protect confidential business information that it receives. The Company may assert a business confidentiality claim (in the manner specified in 40 C.F.R. § 2.203(b)) for all or part of the information requested by EPA. However, business information is entitled to confidential treatment only if it satisfies the criteria set forth in 40 C.F.R. § 2.208. EPA will disclose business information entitled to confidential treatment only as authorized by 40 C.F.R. § 2, Subpart B. If no claim of confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice.
5. Notice is hereby given, pursuant to 40 C.F.R. §§ 2.301(h) and 2.310(h), that EPA may disclose confidential information provided by the Company to EPA's authorized representatives, including its contractors, Eastern Research Group, Inc. ("ERG") Confidential information may be disclosed to EPA's authorized representatives for the following reasons: to assist with document handling, inventory and indexing; to assist with document review and analysis for verification of completeness; and to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. §§ 2.301(h) and 2.310(h), the Company may submit, along with its response to this Information Request, any comments regarding EPA's disclosure of confidential information to its authorized representatives.
6. If information or documents not known or available to the Company at the time of its response to this Information Request later become known or available to it, it must supplement its response to EPA. Moreover, should the Company find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the Company must notify EPA as soon as possible and provide EPA with a corrected response.
7. If information responsive to a request is not in the Company's possession, custody, or control, identify the persons or entities from whom such information may be obtained. For each individual or entity that possesses responsive information, please provide the following: name, last known or current address, telephone number, and affiliation with the Company or the Facility.

8. If you believe there are grounds for withholding information or documents that are responsive to this request, e.g., attorney-client privilege, you must identify the information or documents and state the basis for withholding.

DEFINITIONS

The following definitions apply to the following terms (words or phrases) as they appear in this Information Request. Defined terms are enclosed in quotation marks:

1. "You" or the "Company" shall mean ExxonMobil Corporation, or its officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.
2. "Facility" means all buildings, equipment, structures, installations, pipes, or stationary items owned, leased, or operated by ExxonMobil Corporation, at the ExxonMobil Refinery property or properties located at 3700 West 190th Street, Torrance, CA 90509-2929, or contiguous or adjacent to that address.
3. "Document" or "documents" shall mean any printing, typing, writing, photostat, or any other copy, microfilm, film record, video record, CD, sound recording, tape, disc, or other type of memory associated with computers, including any instructions necessary to read such material, and any other tangible item recording information.
4. "Chemical" shall mean any extremely hazardous substance listed in Appendices A and B of 40 C.F.R. § 355; any hazardous substance, as defined in Section 101(14) of CERCLA, including any mixtures of hazardous substances with any other substances, such as petroleum products; and any pollutant or contaminant, as defined in Section 101(33) of CERCLA, including any mixtures of pollutants or contaminants with any substances, such as petroleum products.
5. "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and shall include any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances or pollutants or contaminants. For the purpose of this Information Request, "Release" specifically shall mean the September 6, 2015 discharge(s) of hydrofluoric acid at the Facility.
6. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the CAA, CERCLA, EPCRA, 40 C.F.R. § 68, 40 C.F.R. § 300, or 40 C.F.R. § 355, in which case the statutory or regulatory definitions shall apply.

INFORMATION REQUEST

REQUESTS REGARDING CERCLA SECTION 103 AND EPCRA SECTION 304 COMPLIANCE

1. With respect to the Release, provide:
 - a. The date and time that the Release was identified, including a description of how the release was identified;
 - b. The name(s) and CAS number(s) for any Chemical(s) discharged during the Release;
 - c. The quantity of the Chemical(s) discharged during the Release, including all calculations for how each quantity was determined (include all calculations, estimations, or assumptions relied upon in making the determination as well as all supporting documentation such as log books, monitoring equipment print-outs, and manifests);
 - d. The time (day/hour/minute) that the Release began and the time that it ended;
 - e. Information regarding whether any alarms were triggered by the Release and what time the alarms were triggered;
 - f. A description of the specific location, including identification on a Facility and Process unit map, where the Release occurred;
 - g. A description of how the Release was vented, cleared, captured, controlled, or mitigated at the Facility;
 - h. The date and time, including date and time of any follow-up notifications or reports, that the Company notified (1) National Response Center, (2) the state Office of Emergency Services, (3) the local fire department or hazardous materials response team, and (4) the Certified Unified Program Agency ("CUPA") of the Release, and all supporting documentation;
 - i. All documents reflecting notification or communication with emergency responders; and
 - j. The time that emergency response personnel, if any, arrived at the Facility and time that emergency response personnel left the Facility.

REQUESTS REGARDING THE CLEAN AIR ACT SECTION 112(r) RISK MANAGEMENT PROGRAM AND GENERAL DUTY CLAUSE

1. Identify on a Facility map, all locations where hydrofluoric acid is stored, transported, and used. Provide a description for each location, include a description of how hydrofluoric acid is stored including the daily average and maximum storage quantities (in both pounds and gallons). For transportation into or at the Facility, please describe the method including the associated flow rate(s) or frequency of movement.
2. Provide the Company's temporary leak seal and repair policy for the Facility, including any standard operating procedure(s).
3. Provide a description of the leak seal and repair tracking system used for the Facility.

4. Provide documents with the following information relating to the Release:
 - a. Identification of the name of the process unit and associated equipment at which the Release occurred. Include equipment design specifications/drawings/sketches – schematics, piping and instrumentation design drawings (“P&IDs”), design basis, mass/energy balances and safety/process interlock schedules/narratives and block flow diagrams.
 - b. A description, including any supporting documentation, of any onsite impacts from the Release, including any death, injuries, or property damage, and any offsite impacts.
- b. Process Safety Information
 - i. Provide the Safety Data Sheet for the hydrofluoric acid located at the Facility;
 - ii. Provide documentation that demonstrates how the chemical modifier reduces hydrofluoric acid volatility and include the volatility of the hydrofluoric acid used at the Facility;
 - iii. Provide Process Flow Diagrams and P&IDs for the Alkylation unit;
 - iv. Provide a list of all non-steam/water leak seals and repairs in the Alkylation unit. For each clamp provide the location identification of the leak seal or repair installation date, reason for the installation of the clamp (including all supporting documentation), and a description of the clamp including the type of clamp, inspection schedules and documentation, the scheduled date of removal;
 - v. Provide a description of all hydrofluoric acid leak detection systems located at the Facility, including but not limited to the design basis, calculations, maps, diagrams, and other supporting documentation;
 - vi. Provide a description of all hydrofluoric acid mitigation systems, including but not limited to the design basis, calculations, maps, diagrams, and other supporting documentation.
- c. Operating Procedures
 - i. List the Operating Procedures for the Alkylation Unit and the handling, operation, or maintenance of hydrofluoric acid or hydrofluoric acid containing equipment;
 - ii. Provide a copy of the Emergency Operating Procedure(s) that were used during the Release, including but not limited to the Emergency Operating Procedure, Temporary Operating Procedure, Emergency Shut-Down Procedure;
 - iii. Explain the operational status of the Alkylation Unit and associated equipment at the time of the Release;
- d. Training
 - i. Provide a list of training programs for the Alkylation Unit, the handling or operation of hydrofluoric acid equipment, and the maintenance of hydrofluoric acid equipment. For these trainings, provide training records,

- including the name, the date of training and means used to verify understanding of the training for all employees and contractors;
 - ii. Identify the employees and supervisory personnel on duty at the Alkylolation Unit at the time of the Release: include name, title, years of experience, and length of time on the Unit and in the position at the time of the Release.
- e. Mechanical Integrity
 - i. Provide a list of the equipment involved in the Release and all associated design, installation, inspection, and maintenance records.
- f. Management of Change
 - i. Provide documentation on any changes, excluding in-kind replacements, to the Alkylolation Unit and equipment involved in the Release, including but not limited to, associated piping, relief systems, hardware, software, chemistry, and operating procedures.
- g. Pre-startup review
 - i. All documentation related to any pre-startup safety review (PSSR) executed as part of start-up at the Alkylolation Unit or part thereof from 2010 through the date of this Information Request.
- h. Release Investigation
 - i. For the Release, provide each investigation report, root-cause analysis, and any other investigative report or description. Include resolution or status for all findings and/or recommendations, the person assigned responsibility for resolution, and the target dates for resolution and status. If an investigation report is incomplete, provide the status of the report(s) and projected date(s) of completion, as well as responsible personnel.
- i. Employee Participation
 - i. List the name, position, and a description of the discussion or decision making event for all Employees involved in discussions and decision making processes for the design, hazard assessment, inspection, and maintenance of the Alkylolation Unit for the past five years.
- j. Contractors
 - i. Indicate whether contract personnel were involved in the maintenance, design or operation of the Alkylolation Unit during the previous five years. If so, provide information on contract personnel's duties performed, qualifications, Company supervisor, certifications, training and years of experience of each contract employee involved.